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Attorneys for General Motors LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	: Chapter 11
	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	: Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:
	:
Debtors.	: (Jointly Administered)
-----X	

NOTICE OF FILING OF FOURTH SUPPLEMENT TO THE CHART OF PRE-CLOSING ACCIDENT LAWSUITS SET FORTH IN THE MOTION OF GENERAL MOTORS LLC PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE THE COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION AGAINST PLAINTIFFS IN PRE-CLOSING ACCIDENT LAWSUITS

PLEASE TAKE NOTICE that on March 23, 2015, General Motors LLC filed the attached *Fourth Supplement to the Chart of Pre-Closing Accident Lawsuits Set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits* with the United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York
March 23, 2015

Respectfully submitted,

/s/ Scott I. Davidson

Arthur Steinberg

Scott Davidson

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**FOURTH SUPPLEMENT¹ TO CHART OF
PRE-CLOSING ACCIDENT LAWSUITS
COMMENCED AGAINST NEW GM NOT LISTED
IN MOTION TO ENFORCE**

	<u>Plaintiff</u>	<u>Date of Accident</u>	<u>Vehicle Year and Model</u>
1	Betancourt Vega ²	March 21, 2008	2005 Chevrolet Cobalt

¹ Pursuant to the *Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits* (the "**Motion to Enforce**") [Dkt. No. 12808-1], New GM reserved the right to supplement the list of Pre-Closing Accident Lawsuits set forth in the Motion to Enforce in the event additional cases were brought against New GM that implicate similar provisions of the Sale Order and Injunction. *See* Motion to Enforce, p. 7 n.6.

² The Action identified in the chart above is captioned *Betancourt Vega v. General Motors, LLC, et al.* pending in the United States District Court for the District of Puerto Rico (the "**Betancourt Vega Action**"). A copy of the complaint filed in the Betancourt Vega Action is attached hereto as Exhibit "A."